

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC,

Plaintiff,

V.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.;

Defendants.

Case No. 2:23-cv-00285-JRG-RSP

PLAINTIFF’S NOTICE OF *SOTERA* STIPULATION

Plaintiff Cobblestone hereby notifies the Court that the Samsung Defendants filed a *Sotera* stipulation in IPR2024-00315, Paper 8, which makes the following stipulation regarding the Samsung Defendants’ invalidity arguments for Patent 9,094,888:

Petitioners hereby stipulate that if the Board institutes *inter partes* review in this proceeding, IPR2024-00315, then Petitioners will not pursue in the parallel litigation, *Cobblestone Wireless, LLC v. Samsung Electronics Co., Ltd. et al.*, No. 2:23-cv-00285 (E.D. Tex.), the same grounds in the Petition (Paper 3) or any grounds that could have reasonably been raised before the Board.

Samsung Electronics Am., Inc. v. Cobblestone Wireless, LLC, IPR2024-00315, Paper 8 at 2 (May 7, 2024). In *Sotera Wireless, Inc. v. Masimo Corp.*, “Petitioner filed a stipulation in the District Court.” IPR2020-01019, Paper 12 at 13 (Dec. 1, 2020) (filing stipulation in *Masimo Corporation*

v. Sotera Wireless, Inc., No. 3:19-cv-01100-BAS-MSB, Dkt. 86 (S.D. Cal. Oct. 15, 2020)).

Accordingly, Plaintiff hereby files a true and correct copy of the Samsung Defendants' stipulation as Exhibit A.

Other than filing a copy of the stipulation in the record, no other relief is sought by Plaintiff at this time. Samsung has indicated it may seek to withdraw this stipulation.

Dated: June 7, 2024

Respectfully submitted,

/s/ Reza Mirzaie

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***ATTORNEYS FOR PLAINTIFF,
COBBLESTONE WIRELESS, LLC***

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Texas using the ECF System, and served defendants with a copy via electronic mail.

Additionally, copies are being served on Samsung's IPR counsel by email:
jimglass@quinnemanuel.com, quincylu@quinnemanuel.com, and
jasonwiliams@quinnemanuel.com.

/s/ Reza Mirzaie
Reza Mirzaie